

# **EXHIBIT B**



## APPEARANCES

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Nwauzor, et al.:

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MORNING SESSION

JANUARY 10, 2020

THE COURT: This is the time we set for a preliminary pretrial conference in Cause Number 17-5769, Nwauzor versus GEO, and 17-5806, State versus GEO.

Let me call the role here. First, for Washington, Ms. Chien, Ms. Brenneke and Mr. Polozola.

For the plaintiffs, Nwauzor and others, Mr. Whitehead.

MR. WHITEHEAD: Good morning, Your Honor.

THE COURT: Mr. Theriot-Orr

MS. THERIOT-ORR: Yes, sir, good morning.

THE COURT: Mr. Free.

MR. FREE: Yes, sir.

THE COURT: For the defendants, Mr. Barnacle.

MR. BARNACLE: Good morning.

THE COURT: Ms. Scheffy and Ms. Mell.

MS. MELL: Good morning, Your Honor.

THE COURT: We have a number of things to cover this morning. First thing is, I want to get a better feel than I have for exactly what the claims of the plaintiffs are here, and understand a bit more of how you propose to prove your claims.

I had this nice sheet with your names on it, and then I covered it up.

I guess I should ask Mr. Whitehead to go first and tell me

1 have heard. It seems to me there are things like punishment  
2 for not working or different things that are not within what  
3 you two have described today. Are you anticipating any  
4 evidence along those lines of inappropriate activities on the  
5 part of GEO toward detainees?

6 MS. BRENNEKE: I am thinking about our claims as  
7 being fairly discrete whether or not the Minimum Wage Act is  
8 being applied for work, and also whether there is an  
9 injustice for them to retain the benefits of those for the  
10 unjust enrichment claim moving forward.

11 I believe with the unjust enrichment claim, there is some  
12 maybe potential for thinking about the circumstances in which  
13 they are working and the injustice of that, that is a bit  
14 broader because that is an equitable claim that is a  
15 subjective standard.

16 We are not bringing claims you might have seen reported in  
17 some of the cases like in Colorado and other places where  
18 there is like a forced work situation or other types of  
19 claims that I think could be brought in some circumstances.  
20 We have not brought those claims.

21 Jamal, I don't know if --

22 MR. WHITEHEAD: No, I don't have anything further to  
23 add. Certainly, Your Honor, we believe those things to be  
24 true. In terms of what we would try to present and prove at  
25 trial, that is not the case we intend to bring.